

**EXHIBIT “B”**

**CITIMORTGAGE, INC., IRAIDE PERUCHI, AND MATTHEW AND ALEXIS  
FREITAS’S OBJECTION TO DEBTORS’ MOTION FOR ENTRY OF ORDER  
ESTABLISHING PROCEDURES ENFORCING INJUNCTIVE PROVISIONS OF PLAN**

Prince Lobel Tye LLP  
100 Cambridge Street, Suite 2200  
Boston, Massachusetts 02114  
617 456 8000 main 617 456 8100 fax  
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May 31, 2013

Via Email and First Class Mail

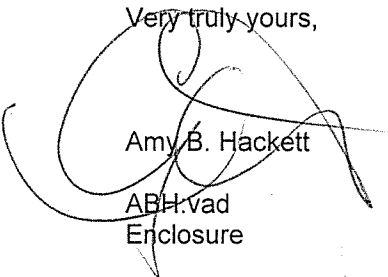
Jeffrey B. Loeb, Esq.  
David Glod, Esq.  
Rich May  
176 Federal Street, 6<sup>th</sup> Floor  
Boston, MA 02110

Re: CitiMortgage, Inc., v. Richard J.J. Manchester, GMAC Mortgage, LLC, RBS Citizens, N.A., and  
Jami A. Rodger  
Civil Action No. SUCV2012-03708-G

Dear Counsel:

Enclosed for service upon you in the above matter is GMAC Mortgage, LLC's Response to Plaintiff's First Request for Production of Documents.

Very truly yours,



Amy B. Hackett

ABH:vad  
Enclosure

cc: Richard J.J. Manchester, via first class mail  
RBS Citizens, NA, via first class mail  
Jami A. Rodger, via first class mail

Direct Dial: 617-456-8092  
Email: [ahackett@PrinceLobel.com](mailto:ahackett@PrinceLobel.com)

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

SUPERIOR COURT  
CIVIL ACTION  
NO. SUCV2012-03708-G

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CITIMORTGAGE, INC.,

Plaintiff,

v.

RICHARD J.J. MANCHESTER, GMAC  
MORTGAGE, LLC, RBS CITIZENS, N.A., and  
JAMI A. RODGER,

Defendants

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**GMAC MORTGAGE, LLC'S RESPONSES TO PLAINTIFF CITIMORTGAGE, INC.'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rule 34 of the Massachusetts Rules of Civil Procedure,<sup>1</sup> GMAC Mortgage, LLC ("GMACM") submits its responses to the First Request for Production of Documents served by CitiMortgage, Inc. ("Citi"). The following responses and objections, and the documents produced herein, are based upon information now known. GMACM has not yet completed discovery or preparation for trial in this matter and therefore reserves the right to amend modify, or supplement the objections and responses set forth below.

Pursuant to Superior Court Standing Order 1-09(3)(c), GMACM states that it is in the process of undertaking a diligent search for responsive documents, including searching its electronic system of records for documents related to the acquisition or assignment of the mortgage at issue in this matter.

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<sup>1</sup> These requests were originally served in the Housing Court Action. However, the Housing Court Action was, in effect, administratively consolidated with the Superior Court Action.

**REQUEST NO. 1**

Any and all documents which support the assertion in the attached Notice of Mortgagee's Sale of Real Estate that as of September 19, 2007, GMAC Mortgage, LLC was the "present holder" of the mortgage granted by Richard J.J. Manchester to Mortgage Electronic Registration Systems, Inc. ("MERS"), as nominee for GMAC Bank on property located at 302 South St. Jamaica Plain, Suffolk County, Massachusetts.

**RESPONSE NO. 1**

GMACM will produce all responsive documents in its custody, possession, and control.

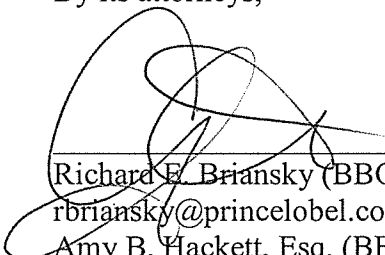
**REQUEST NO. 2**

The original promissory note that is secured by the mortgage granted by Manchester to Mortgage Electronic Registration Systems, Inc. ("MERS"), as nominee for GMAC Bank on property located at 302 South St. Jamaica Plain, Suffolk County, Massachusetts, Massachusetts that is reference in the attached Notice of Mortgagee's Sale of Real Estate.

**RESPONSE NO. 2**

GMACM will produce all responsive documents in its custody, possession, and control.

Defendant  
GMAC MORTGAGE, LLC  
By its attorneys,



Richard E. Briansky (BBO# 632709)

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Amy B. Hackett, Esq. (BBO# 676345)

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(617) 456-8000

Dated: May 31, 2013

CERTIFICATE OF SERVICE

I, Amy B. Hackett, certify that on May 31, 2013, I served a copy of the foregoing document on counsel for Plaintiff by delivering a copy of the same via email and first class mail, postage prepaid, and a copy via first class mail, postage prepaid, on the co-defendants as follows:

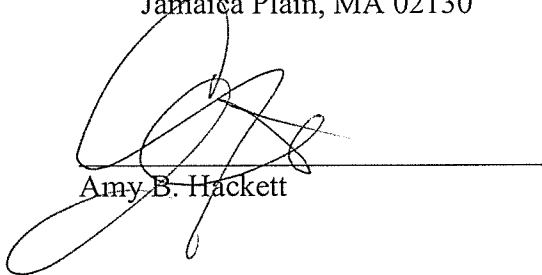
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(Counsel for Plaintiff)

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Jami A Rodger  
302 South Street, Unit 2  
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Amy B. Hackett